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Superior Court of California
County of Los Angeles

AUG 07 2018

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DOWNTOWN CENTER BUSINESS
IMPROVEMENT DISTRICT
MANAGEMENT CORPORATION
(also sued erroneously as Downtown
Center Business Improvement District)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

HILL RHF HOUSING PARTNERS, L.P. a
California limited partnership; OLIVE RHF
HOUSING PARTNERS, L.P., a California
limited partnership,

Petitioner/Plaintiffs,

v.

CITY OF LOS ANGELES; DOWNTOWN
CENTER BUSINESS IMPROVEMENT
DISTRICT, a special assessment district in the
City of Los Angeles; DOWNTOWN CENTER
BUSINESS IMPROVEMENT DISTRICT
MANAGEMENT CORPORATION, a
California nonprofit corporation; and DOES 1
through 10, inclusive,

Respondents/Defendants.

Case No. BS170127
Unlimited Jurisdiction

(Case assigned to Hon. Amy Hogue)

DECLARATION OF SUZANNE
HOLLEY IN SUPPORT OF
RESPONDENT DOWNTOWN CENTER
BUSINESS IMPROVEMENT DISTRICT
MANAGEMENT CORPORATION'S
RESPONSIVE TRIAL BRIEF

Complaint Filed: July 3, 2017
Trial Date: September 19, 2018
Time: 9:30 a.m.
Dept.: 86

FILED

Colantuono, Highsmith & Whatley, PC
790 E. COLORADO BOULEVARD, SUITE 850
PASADENA, CA 91101-2109

DECLARATION OF SUZANNE HOLLEY

I, SUZANNE HOLLEY, declare as follows:

1. I am the Executive Vice President & Chief Operating Officer for the Downtown Center Business Improvement District Management Corporation ("Management Corporation"). The Management Corporation oversees the day-to-day operations of the Downtown Center Business Improvement District ("DCBID").

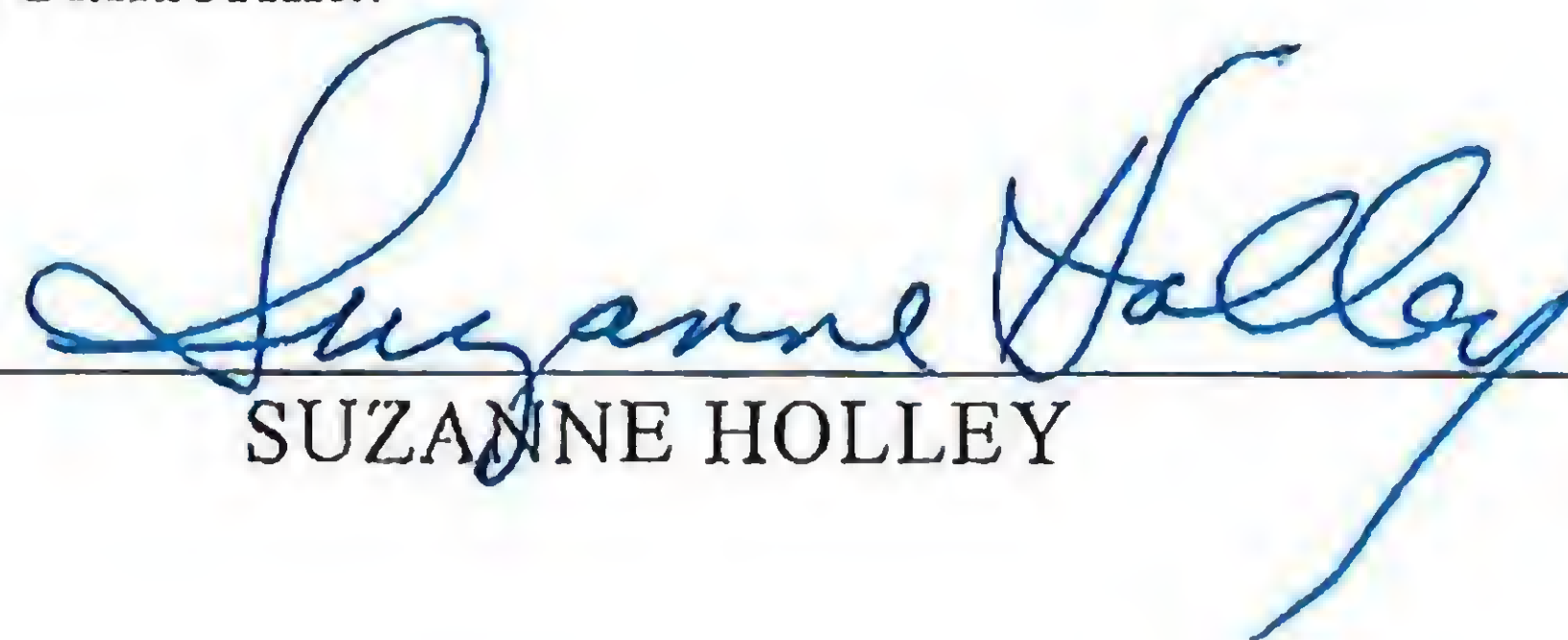
2. DCBID provides safety and sanitation services to the property owners within the District, among other services.

3. Angelus Plaza, located at 225 South Hill Street, and Angelus Plaza North, located at 200 South Oliver Street, are located within the DCBID ("Angelus Plaza Properties").

4. As of April 2018, DCBID completed 51 service calls to the Angelus Plaza Properties, some in response to calls from tenants there and others initiated by DCBID staff. These include responses to maintenance requests, wellness checks, response to work orders, and service calls, such as responding to concerns of trespassers on the properties.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 7, 2018, in Los Angeles, California.


SUZANNE HOLLEY

Colantuono, Highsmith & Whatley, PC
790 E. COLORADO BOULEVARD, SUITE 850
PASADENA, CA 91101-2109

PROOF OF SERVICE

Hill RHF Housing Partners v. City of Los Angeles, et al.
Los Angeles Superior Court Case No. BS 170127

I, the undersigned, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 790 E. Colorado Blvd., Suite 850, Pasadena, CA 91101. On **August 7, 2018**, I served the document(s) described as: **DECLARATION OF SUZANNE HOLLEY IN SUPPORT OF RESPONDENT DOWNTOWN CENTER BUSINESS IMPROVEMENT DISTRICT MANAGEMENT CORPORATION'S RESPONSIVE TRIAL BRIEF** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

- ☐ **BY FACSIMILE:** By transmitting via facsimile the document(s) listed above to the fax number(s) set forth above on this date.
- ☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed on the attached service list.
- ☐ **BY MAIL:** The envelope was mailed with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after service of deposit for mailing in affidavit.
- ☐ **OVERNIGHT DELIVERY:** By overnight delivery, I placed such document(s) listed above in a sealed envelopes, for deposit in the designated box or other facility regularly maintained by FEDERAL EXPRESS or GOLDEN STATE OVERNIGHT (GSO) for overnight delivery. I caused such envelopes to be delivered to the office of the addressees listed on the attached service list via overnight delivery pursuant to C.C.P. §1013(c), with delivery fees fully prepaid or provided for.
- ☐ **PERSONAL SERVICE:** I caused such envelopes to be delivered by hand to the addresses indicated on the attached service list.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **August 7, 2018**, at Los Angeles, California.


Angelo McCabe

SERVICE LIST

Hill RHF Housing Partners v. City of Los Angeles, et al.
Los Angeles Superior Court Case No. BS 170127

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